

Oct. 13, 2004

Dear Art,

Thank you and bless you all for devising The Star Program released 9-16-04! Also I am very pleased that The Federal EPA backs the plan (C-J. 10-13-04).

I trust that the APCD will maintain the expertise and personnel to assure honest reporting by the affected chemical companies and to often inspect plant equipment to prevent leaks and accidents (which I understand, are a major source of our high rate of toxic air pollution). Fugitive emissions need to be reduced to zero and heavily fine when they occur.

About the health risk assessment standard: For the 18 worst chemicals, a 1 lifetime cancer or other disease risk per million population, is the next best thing to a preferred zero risk tolerance. However, I object to the proposed flexibility that allows 7.5 per 1 million for each companies' combined total pollution. I oppose also the "air shed" total of 10 per 1 million for all companies' combined emissions. To grant exemptions, in addition to this flexibility, for failure to meet the health risk goal within the specified time frame although making significant progress, or after applying the best technology available, I consider much too lax, if the public is to trust and take seriously the promise to reduce our toxic air pollution.

Is it intelligent, much less wise, to continue to poison ourselves for whatever reason-jobs, stockholder profit, convenient products, etc.?

I'm for holding the local chemical plants and other toxic air polluters to the 1 per 1 million risk assessment, without flexibility or exemption.

Also, The 2nd tier body of 20 other toxic chemical air pollutants should not be allowed "at levels above the health risk goal" (Highlights, bullet #5). I may misunderstand this, however, because under Implementation Timeline, bullets 6, 8, 10 and 11 seem to imply that the 20 other toxics must indeed meet the 1 per 1 million "health risk goal". I need clarification on this seeming contradiction.

Please resist the technological imperative just because something can or could be done does not mean that it should be done. Noveon does not really need to expand for the purpose of producing a PVC pipe that requires a higher temperature (C-J. 10-14-04), PVC is very toxic when burned and the less of it in our environment the safer we are from its' harmful effects. In recent months Noveon has experienced a serious explosion and a fire that were devastating to the people nearby. The permit for expansion should, & I hope will, be, denied.

To grant exemptions to the risk standard negates the promise and defeats the purpose of the wonderful Star Program (strategic toxic Air Reduction), and I ask that the exemption proposed be withdrawn and deleted.

However, if it has to stay for perhaps legal requirements, I strongly request that the public be involved in the Board's decision-making, by way of a public hearing requirement, prior to the granting of an exemption.

Sincere and heartfelt thanks to all involved in producing this long hoped for regulation.

Sincerely, Winnie Hepler, JRC & React member
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